

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO:
)	NO: 05-CV-10448-GAO
BLUE CROSS BLUE SHIELD OF)	
MASSACHUSETTS, INC., BLUE CROSS)	
BLUE SHIELD LONG-TERM)	
DISABILITY BENEFIT PLAN, a/k/a)	
OMNIBUS WELFARE BENEFITS)	
PLAN, KEMPER NATIONAL)	
SERVICES, INC., BROADSPIRE)	
SERVICES, INC., AND SHELDON)	
MYERSON, MD.,)	
)	
Defendants.)	
)	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR REFERRAL TO
COURT'S NON-BINDING ALTERNATIVE DISPUTE RESOLUTION PROGRAM**

Defendants Blue Cross and Blue Shield of Massachusetts, Inc., Blue Cross and Blue Shield of Massachusetts, Inc. Omnibus Welfare Benefit Plan, Blue Cross Blue Shield Long-Term Disability Benefit Plan, Kemper National Services, Inc., Broadspire Services, Inc. and Sheldon Myerson, M.D. (collectively, "Defendants") respond that they have no opposition to plaintiff's motion for referral of this case to the Court's non-binding Alternative Dispute Resolution Program, said motion having been filed with the Court on April 25, 2006.

Defendants respond further by stating that they have no opposition to plaintiff's request, as stated in plaintiff's motion, that all other matters in this case, including the filing of motions for summary judgment, be stayed pending the conclusion of the non-binding alternative dispute resolution referral.

WHEREFORE, Defendants respectfully request that plaintiff's motion be allowed, that this matter be referred to the Court's non-binding Alternative Dispute Resolution Program and that all other matters in this case be stayed pending the conclusion of non-binding alternative dispute resolution.

Blue Cross and Blue Shield of Massachusetts, Inc.,
Blue Cross and Blue Shield of Massachusetts, Inc.
Omnibus Welfare Benefit Plan
By their attorneys,

/s/ Joseph Halpern

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BLUE CROSS BLUE SHIELD LONG TERM
DISABILITY BENEFIT PLAN, KEMPER
NATIONAL SERVICES, INC., BROADSPIRE
SERVICES, INC., and SHELDON MYERSON,
M.D.

/s/ Edward S. Rooney, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on 5/1/06

By: E. S. Rooney 